

Pro Se 1 2016

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

GENEVA LANGWORTHY, et al,

Plaintiff(s),

v.

WASHINGTON COURTS, and

GEORGE ROCHE,

Defendant(s).

CASE NO. 21-cv-1615-RAJ

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☒ Yes ☐ No

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Name GENEVA LANGWORTHY

Street Address 240 S. Sunnyside Ave. Unit 2802

City and County Sequim, Clallum County

State and Zip Code WA 98382

Telephone Number 360-797-3386

B. Defendant(s).

Defendant No. 1

Name WASHINGTON COURTS

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| | |
|----------------------------------|-----------------------------------|
| Job or Title (<i>if known</i>) | Superior Court for Whatcom County |
| Street Address | 311 Grand Ave. Ste 301 |
| City and County | Bellingham, Whatcom County |
| State and Zip Code | WA 98225 |
| Telephone Number | 360-778-5560 and 360-778-5400 |

Defendant No. 2

| | |
|----------------------------------|-----------------------------------|
| Name | GEORGE ROCHE |
| Job or Title (<i>if known</i>) | Senior Civil Prosecuting Attorney |
| Street Address | 311 Grand Ave. Ste. 201 |
| City and County | Bellingham, Whatcom County |
| State and Zip Code | WA 98225 |
| Telephone Number | 360-676-6784 |

Defendant No. 3

| | |
|----------------------------------|-----------------------------------|
| Name | WASHINGTON COURTS |
| Job or Title (<i>if known</i>) | District Court for Whatcom County |
| Street Address | 311 Grand Ave. Ste. 401 |
| City and County | Bellingham, Whatcom County |
| State and Zip Code | WA 98225 |
| Telephone Number | 360-778-5400 |

Defendant No. 4

| | |
|----------------------------------|--------------------------|
| Name | WASHINGTON COURTS |
| Job or Title (<i>if known</i>) | Court of Appeals, Div. I |
| Street Address | 600 University St. |
| City and County | Seattle, King County |
| State and Zip Code | WA 98101-1176 |
| Telephone Number | 206-464-7750 |

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1 **II. BASIS FOR JURISDICTION**

2 What is the basis for federal court jurisdiction? (*check all that apply*)

3 ☒ Federal question ☐ Diversity of citizenship.

4 A. If the Basis for Jurisdiction Is a Federal Question

5 List the specific federal statutes, federal treaties, and/or provisions of the United States

6 Constitution that are at issue in this case.

7 28 CFR Part 35 Non-Discrimination on the Basis of Disability in State and Local

8 Government Services (ADA)

9
10 **III. STATEMENT OF CLAIM**

11 *Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.*

14 The Washington Courts maintain a practice of discriminatorily and retaliatorily denying
15 due process to individuals with disabilities, and of responding to Reasonable Accommodation
16 Requests with deliberate indifference. Whatcom County Prosecuting Attorney George Roche
17 retaliated and interfered with Plaintiff's civil rights by collaborating with a private attorney
18 opposing the Plaintiff, while ex parte advising the courts to deny disability accommodation. The
19 discrimination is on-going, and increasingly serious. (See attached pages)

20 **IV. RELIEF**

21 1. Injunctive relief from on-going discrimination, including a stay against the Washington
22 Courts preventing them from sanctioning Ms. Langworthy for exercising her rights under the
ADA by prohibiting her from appealing or otherwise exercising her right of access to the courts.

2. Retrospective relief for harm done, including monetary damages where available.

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1 3. An injunction requiring the Washington Courts to appoint a Guardian ad Litem or a
2 cognitive interpreter to a litigant with hidden disabilities, upon the individual's request.

3 4. Mandatory sensitivity and awareness training to prevent unconscious bias.

4 V.

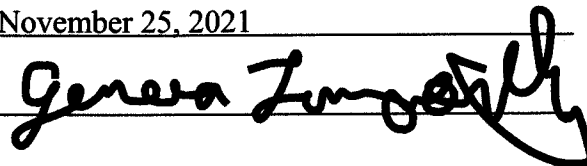
CERTIFICATION AND CLOSING

5 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my
6 knowledge, information, and belief that this complaint: (1) is not being presented for an improper
7 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
8 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
9 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
10 identified, will likely have evidentiary support after a reasonable opportunity for further
11 investigation or discovery; and (4) the complaint otherwise complies with the requirements of
12 Rule 11.

13 I agree to provide the Clerk's Office with any changes to my address where case-related
14 papers may be served. I understand that my failure to keep a current address on file with the
15 Clerk's Office may result in the dismissal of my case.

16 Date of signing: November 25, 2021

17 Signature of Plaintiff



18 Printed Name of Plaintiff

Geneva Langworthy